

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**NON-PARTY ADOBE INC.'S MOTION AND SPECIFIC OBJECTIONS
WITH PROPOSED REDACTIONS TO THE PARTIES' TRIAL EXHIBITS**

Pursuant to the Court's June 24, 2024 Pretrial Scheduling Order providing that "[a]ny party or non-party who objects to the public use of confidential documents or testimony must file a specific objection with a proposed acceptable redaction of the information," ECF No. 871, and Local Civil Rule 5(C), Non-Party Adobe Inc. ("Adobe"), through undersigned counsel, respectfully requests that the Court grant its objections and proposed redactions, and order Google to keep under seal DTX 386, DTX 508, DTX 1015, DTX 2122, DTX 2123, and DTX 2124, and redact DTX 1839, DTX 1891, DTX 1892, DTX 1893, DTX 1943, DTX 1955, DTX 1982, DTX 1991, and Appendix Sections X.A and X.B to the Israel Report. Adobe further requests that the Court order DOJ to redact PTX 1308, PTX 1309, PTX 1388, PTX 1389, PTX 1432, PTX 1433, PTX 1434, and PTX 1435. These exhibits contain information that Adobe designated as Highly Confidential under the Protective Order, ECF No. 203. The grounds for this motion are contained in the supporting memorandum of law filed concurrently with this motion, and a proposed order is attached for the Court's convenience.

Dated: July 26, 2024

Respectfully submitted,

/s/ Dorothea R. Allocca

Peter J. Mucchetti (*pro hac vice pending*)

Dorothea R. Allocca (VSB No. 96855)

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